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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SILVER STATE FAIR HOUSING) Case No. 3:12-CV-00229-RCJ (VPC)
COUNCIL, INC., and JOYCE EVELYN)
RUANO,)
Plaintiffs,)
v.)
ROSEWOOD PARK, LLC and)
MAGGIE CUEVAS,)
Defendants.)
UNITED STATES OF AMERICA,)
Plaintiff,)
v.)
ROSEWOOD PARK, LLC,)
BUFF MANAGEMENT, INC., CHAIM)
FREEMAN, JANE NOWACK, and)
MAGGIE CUEVAS)
Defendants.)

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1 The United States respectfully moves this Court to excuse Housing and Civil
2 Enforcement Chief Steven H. Rosenbaum and Deputy Chief R. Tamar Hagler from the
3 settlement conference scheduled for September 12, 2013. Pursuant to the Court's Order dated
4 August 13, 2013 (ECF No. 80), all counsel who will be litigating the case, as well as an
5 authorized representative with final settlement authority must attend the settlement conference.
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7 The United States will be represented at the settlement conference by Civil Rights
8 Division Trial Attorneys Jessica Crockett and Roger Severino who expect to try the case if no
9 settlement is reached. Ms. Crockett and Mr. Severino will have authority to negotiate an
10 agreement in principle at the settlement conference. However, any final resolution will need to
11 be approved by Steven H. Rosenbaum, Chief of the Housing and Civil Enforcement Section of
12 the Civil Rights Division, as well as R. Tamar Hagler, Deputy Chief of the Housing and Civil
13 Enforcement Section.
14

15 Both Mr. Rosenbaum and Ms. Hagler are based in Washington, D.C. Mr. Rosenbaum
16 leads the Housing and Civil Enforcement Section, and Ms. Hagler is one of six deputy chiefs in
17 the Section. The Chief as well as the deputy chiefs are responsible for overseeing fair housing
18 cases across the country. Their supervisory duties and management responsibilities make it
19 difficult for them to attend the settlement conference in person. However, in the event that this
20 motion is granted, Mr. Rosenbaum, Ms. Hagler, or an authorized designee will be available by
21 telephone for the entire settlement conference. Plaintiffs Silver State Fair Housing Council, Inc.
22 and Ms. Ruano do not oppose this Motion. Additionally, based on representations from
23 opposing counsel, it is our understanding that the insurance carrier for Defendants will be present
24 at the conference.
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1 For the foregoing reasons, the United States respectfully requests that Housing and Civil
2 Enforcement Section Chief Steven H. Rosenbaum and Deputy Chief R. Tamar Hagler be
3 excused from the September 12, 2013 settlement conference.

4

5 Dated: September 5, 2013

6

7 Respectfully submitted,

8 UNITED STATES OF AMERICA

9

10 /s/ Jessica Crockett
11 STEVEN H. ROSENBAUM, Chief
12 R. TAMAR HAGLER, Deputy Chief
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28 Attorneys for the United States

IT IS SO ORDERED
Valerie P. Outerbridge
U.S. MAGISTRATE JUDGE
DATED: September 6, 2013

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CERTIFICATE OF SERVICE

I certify that on September 5, 2013, I caused a copy of the foregoing *United States' Unopposed Motion to Excuse Chief and Deputy Chief from Settlement Conference* to be sent via the Court's ECF system to the following:

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/s/ Jessica C. Crockett